



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 8, 2006

Mary Rose Adkins, Treasurer
National Rifle Association of America Political
Victory Fund
11250 Waples Mill Road
Fairfax, VA 22030

Response Due Date:
January 9, 2007

Identification Number: C00053553

Reference: October Monthly Report (09/01/06-09/30/06)

Dear Ms. Adkins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Your committee filed a 48 hour notice(s) informing the Commission of independent expenditures made in support or opposition of federal candidates with "Edmonds Associates" as the payee(s). However, the amounts and dates of public dissemination disclosed on the notice(s) do not appear to correlate with the entries disclosed on Schedule E, supporting Line 24 for the reporting period. If your committee has filed a 48 hour notice(s) for independent expenditures that are not reflected on your report(s), you must file Schedule E during the appropriate reporting period(s) to disclose the payments. Please amend your report to clarify this discrepancy and provide clarifying information.

-Please clarify the disbursement(s) made for "Member Mailing-Postage," "Member Mailing-Printing," and "Member Mailing" on Schedule B supporting Line 29. If this disbursement(s) constitutes a communication to your restricted class which is exempt from the definition of contribution and expenditure under 11 CFR §114.3, it should be disclosed on Line 29 of the Detailed Summary Page. Furthermore, the purpose of each disbursement should include the type of expense, the name, office sought, state, and district, if applicable; of each federal candidate

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identified in the communication, and a statement that the expense is for an internal communication to the restricted class (see Advisory Opinion 2000-3). Please amend your report to properly disclose this activity or provide clarifying information.

-Schedule B discloses an expenditure(s) for "Independent Expenditure-Radio Ads." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) and voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,



Karen E. Trainer
Senior Campaign Finance Analyst
Reports Analysis Division

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